ENCLOSURE 1
COMPLIANCE SCHEDULE OPTIONS
Proposed Waste Discharge Requirements
for the City of Davis WWTP

The following are two options for compliance schedules to meet tertiary treatment, secondary treatment, ammonia, and other related limitations in the City of Davis NPDES permit. These options will be available for consideration by the Regional Water Board at the 25/26 October 2007 Regional Water Board meeting.

OPTION 1:
This option proposes a time schedule for compliance with secondary treatment related limitations and ammonia effluent limitations by six years, six months from the adoption date of this Order~~1 January 2014~~ and a 10 year time schedule for compliance with final tertiary treatment and aluminum and iron effluent limitations.

Make the following changes to the August 2007 tentative NPDES permit:

1. Effluent Limitations and Discharge Specifications, modify IV.A.1.b as follows:

   Percent Removal. Effective six years, six months ~~eight years~~ ~~1 January 2014~~ from the adoption date of this Order, the average monthly percent removal of BOD 5-day 20°C and total suspended solids shall not be less than 85 percent.

2. Effluent Limitations and Discharge Specifications, modify IV.A.1.g as follows:

   Turbidity. Effective ten ~~eight~~ years from the adoption date of this Order, effluent turbidity shall not exceed:

   i. 2 NTU, as a daily average; and
   ii. 5 NTU, more than 5% of the time within a 24-hour period.

3. Effluent Limitations and Discharge Specifications, modify IV.A.1.h as follows:

   Total Coliform Organisms. Effective ten ~~eight~~ years from the adoption date of this Order, effluent total coliform organisms shall not exceed:

   i. 2.2 most probable number (MPN) per 100 mL, as a 7-day median; and
   ii. 23 MPN/100 mL, more than once in any 30-day period.

4. Effluent Limitations and Discharge Specifications, modify IV.A.1.i as follows:

   Tertiary Treatment. Effective ten ~~eight~~ years from the adoption ~~effective~~ date of this Order, wastewater shall be oxidized, coagulated, filtered, and adequately disinfected pursuant to the Department of Health Services reclamation criteria, California Code of Regulations, Title 22, Division 4, Chapter 3, (Tile 22) or equivalent.

5. Effluent Limitations and Discharge Specifications, modify IV.A.2.b as follows:

   Percent Removal. Effective six years, six months ~~eight years 1 January 2014~~ from the adoption date of this Order, the average monthly percent removal of BOD 5-day 20°C and total suspended solids shall not be less than 85 percent.

6. Effluent Limitations and Discharge Specifications, modify IV.A.2.g as follows:

   Turbidity. Effective ten ~~eight~~ years from the adoption date of this Order, effluent turbidity shall not exceed:

   i. 2 NTU, as a daily average; and
   ii. 5 NTU, more than 5% of the time within a 24-hour period.

7. Effluent Limitations and Discharge Specifications, modify IV.A.2.h as follows:

   Total Coliform Organisms. Effective ten ~~eight~~ years from the adoption date of this Order, effluent total coliform organisms shall not exceed:

   i. 2.2 most probable number (MPN) per 100 mL, as a 7-day median; and
   ii. 23 MPN/100 mL, more than once in any 30-day period.

8. Effluent Limitations and Discharge Specifications, modify IV.A.2.i as follows:

   Tertiary Treatment. Effective ten ~~eight~~ years from the adoption ~~effective~~ date of this Order, wastewater shall be oxidized, coagulated, filtered, and adequately disinfected pursuant to the Department of Health Services reclamation criteria, California Code of Regulations, Title 22, Division 4, Chapter 3, (Tile 22) or equivalent.

9. Effluent Limitations and Discharge Specifications, modify IV.A.3.a as follows:

   During the period beginning on the effective date of this Order and ending ten ~~eight~~ years from the adoption ~~effective~~ date of this Order, the Discharger shall maintain compliance with the following limitations at D-001, with compliance measured at Monitoring Location EFF-001 as described in the attached MRP, unless otherwise specified. These interim effluent limitations shall apply in lieu of all final effluent limitations specified for the same parameters during the time period indicated in this provision.

ENCLOSURE 1
COMPLIANCE SCHEDULE OPTIONS
Proposed Waste Discharge Requirements
for the City of Davis WWTP

10. Effluent Limitations and Discharge Specifications, modify Table 7a as follows:

Table 7a. Interim non-CTR Effluent Limitations – Discharge Point 001

Parameter	Units	Effluent Limitations				
		Average Monthly	Average Weekly	Maximum Daily	Annual Average	Instantaneous Maximum
~~BOD 5-day @ 20°C[1]~~	~~mg/L~~	~~30~~	~~45~~	~~90~~		
	~~lbs/day[2]~~	~~1876~~	~~2815~~	~~5633~~		
~~Total Suspended Solids[1]~~	~~mg/L~~	~~50~~	~~75~~	~~150~~		
	~~lbs/day[2]~~	~~3129~~	~~4694~~	~~9388~~		
Turbidity[1,3]	NTU					
Total Coliform Organisms[1]	MPN/100 mL					500
Aluminum, Total Recoverable[4]	ug/L			2200		
~~Ammonia~~	~~mg/L~~			~~20.5~~		
	~~lbs/day[2]~~			~~1280~~		
Iron, Total Recoverable	mg/L			4.0		

1. Compliance is to be measured at Monitoring Location EFF-A as described in the attached MRP.
2. Based on an average dry weather discharge flow of 7.5 mgd.
3. No limitation for turbidity during the period beginning on the effective date of this Order and ending ten ~~eight~~ years from the adoption ~~effective~~ date of this Order.
4. Compliance with the effluent limitations for aluminum can be demonstrated using either total or acid-soluble (inductively coupled plasma/atomic emission spectrometry or inductively coupled plasma/mass spectrometry) analysis methods, as supported by USEPA's Ambient Water Quality Criteria for Aluminum document (EPA 440/5-86-008), or other standard methods that exclude aluminum silicate particles as approved by the Executive Officer.

11. Effluent Limitations and Discharge Specifications, add IV.A.3.b as follows, and renumber subsequent specifications:

During the period beginning on the effective date of this Order and ending six years, six months from the adoption date of this Order ~~1 January 2014~~, the Discharger shall maintain compliance with the following limitations at D-001, with compliance measured at Monitoring Location EFF-001 as described in the attached MRP, unless otherwise specified. These interim effluent limitations shall apply in lieu of the corresponding final effluent limitations specified for the same parameters during the time period indicated in this provision.

12. Effluent Limitations and Discharge Specifications, add Table 7b as follows, and renumber subsequent tables:

Table 7b. Interim non-CTR Effluent Limitations – Discharge Point 001

Parameter	Units	Effluent Limitations				
		Average Monthly	Average Weekly	Maximum Daily	Annual Average	Instantaneous Maximum
BOD 5-day @ 20°C[1]	mg/L	30	45	90		
	lbs/day[2]	1876	2815	5633		
Total Suspended Solids[1]	mg/L	50	75	150		
	lbs/day[2]	3129	4694	9388		
Ammonia	mg/L			20.5		
	lbs/day[2]			1280		

1. Compliance is to be measured at Monitoring Location EFF-A as described in the attached MRP.
2. Based on an average dry weather discharge flow of 7.5 mgd.

13. Effluent Limitations and Discharge Specifications, add IV.A.3.c as follows, and renumber subsequent specifications:

> During the period beginning six years, six months from the adoption date ~~1 January 2014~~ of this Order and ending ten years from the adoption date of this Order~~1 September 2015~~, the Discharger shall maintain compliance with the following limitations at D-001, with compliance measured at Monitoring Location EFF-001 as described in the attached MRP, unless otherwise specified. These interim effluent limitations shall apply in lieu of the corresponding final effluent limitations specified for the same parameters during the time period indicated in this provision.

14. Effluent Limitations and Discharge Specifications, add Table 7c as follows, and renumber subsequent tables:

Table 7c. Interim non-CTR Effluent Limitations – Discharge Point 001

Parameter	Units	Effluent Limitations				
		Average Monthly	Average Weekly	Maximum Daily	Annual Average	Instantaneous Maximum
BOD 5-day @ 20°C[1]	mg/L	30	45	60		
	lbs/day[2]	1876	2815	3753		
Total Suspended Solids[1]	mg/L	30	45	60		
	lbs/day[2]	3129	4694	3753		

1. Compliance is to be measured at Monitoring Location EFF-A as described in the attached MRP.
2. Based on an average dry weather discharge flow of 7.5 mgd.

15. Effluent Limitations and Discharge Specifications, modify IV.A.4.a as follows:

    During the period beginning on the effective date of this Order and ending ten ~~eight~~ years from the adoption ~~effective~~ date of this Order, the Discharger shall maintain compliance with the following limitations at D-002, with compliance measured at Monitoring Location EFF-002 as described in the attached MRP, unless otherwise specified. These interim effluent limitations shall apply in lieu of all final effluent limitations specified for the same parameters during the time period indicated in this provision.

16. Effluent Limitations and Discharge Specifications, modify existing Table 7c as follows:

Table 7a. Interim non-CTR Effluent Limitations – Discharge Point 002

Parameter	Units	Effluent Limitations				
		Average Monthly	Average Weekly	Maximum Daily	Annual Average	Instantaneous Maximum
~~BOD 5-day @ 20°C~~[1]	~~mg/L~~	~~30~~	~~45~~	~~90~~		
	~~lbs/day~~[2]	~~1876~~	~~2815~~	~~5633~~		
~~Total Suspended Solids~~[1]	~~mg/L~~	~~50~~	~~75~~	~~150~~		
	~~lbs/day~~[2]	~~3129~~	~~4694~~	~~9388~~		
Turbidity[1,3]	NTU					
Total Coliform Organisms[1]	MPN/100 mL					500
Aluminum, Total Recoverable[4]	ug/L			6500		
~~Ammonia~~	~~mg/L~~			~~13.2~~		
	~~lbs/day~~[2]			~~826~~		
Iron, Total Recoverable	mg/L			14		

1. Compliance is to be measured at Monitoring Location EFF-A as described in the attached MRP.
2. Based on an average dry weather discharge flow of 7.5 mgd.
3. No limitation for turbidity during the period beginning on the effective date of this Order and ending ten ~~eight~~ years from the adoption ~~effective~~ date of this Order-
4. Compliance with the effluent limitations for aluminum can be demonstrated using either total or acid-soluble (inductively coupled plasma/atomic emission spectrometry or inductively coupled plasma/mass spectrometry) analysis methods, as supported by USEPA's Ambient Water Quality Criteria for Aluminum document (EPA 440/5-86-008), or other standard methods that exclude aluminum silicate particles as approved by the Executive Officer.

17. Effluent Limitations and Discharge Specifications, add IV.A.4.b as follows, and renumber subsequent specifications:

    During the period beginning on the effective date of this Order and ending six years, six months from the adoption date of this Order ~~1 January 2014~~, the Discharger shall maintain compliance with the following limitations at D-002, with compliance measured at Monitoring Location EFF-002 as described in the attached MRP, unless otherwise specified. These interim effluent

limitations shall apply in lieu of the corresponding final effluent limitations specified for the same parameters during the time period indicated in this provision.

18. Effluent Limitations and Discharge Specifications, add Table 7d as follows, and renumber subsequent tables:

Table 7b. Interim non-CTR Effluent Limitations – Discharge Point 001

Parameter	Units	Effluent Limitations				
		Average Monthly	Average Weekly	Maximum Daily	Annual Average	Instantaneous Maximum
BOD 5-day @ 20°C[1]	mg/L	30	45	90		
	lbs/day[2]	1876	2815	5633		
Total Suspended Solids[1]	mg/L	50	75	150		
	lbs/day[2]	3129	4694	9388		
Ammonia	mg/L			13.2		
	lbs/day[2]			826		

3. Compliance is to be measured at Monitoring Location EFF-A as described in the attached MRP.
4. Based on an average dry weather discharge flow of 7.5 mgd.

19. Effluent Limitations and Discharge Specifications, add IV.A.4.c as follows, and renumber subsequent specifications:

<u>During the period beginning six years, six months from the adoption date</u> ~~1 January 2014~~ <u>of this Order and ending ten years from the adoption date of this Order</u>~~1 September 2015~~<u>, the Discharger shall maintain compliance with the following limitations at D-002, with compliance measured at Monitoring Location EFF-002 as described in the attached MRP, unless otherwise specified. These interim effluent limitations shall apply in lieu of the corresponding final effluent limitations specified for the same parameters during the time period indicated in this provision.</u>

20. Effluent Limitations and Discharge Specifications, add Table 7e as follows, and renumber subsequent tables:

Table 7c. Interim non-CTR Effluent Limitations – Discharge Point 002

Parameter	Units	Effluent Limitations				
		Average Monthly	Average Weekly	Maximum Daily	Annual Average	Instantaneous Maximum
BOD 5-day @ 20°C[1]	mg/L	30	45	60		
	lbs/day[2]	1876	2815	3753		

Parameter	Units	Effluent Limitations				
		Average Monthly	Average Weekly	Maximum Daily	Annual Average	Instantaneous Maximum
Total Suspended Solids[1]	mg/L	30	45	60		
	lbs/day[2]	3129	4694	3753		

3. Compliance is to be measured at Monitoring Location EFF-A as described in the attached MRP.
4. Based on an average dry weather discharge flow of 7.5 mgd.

21. Provisions, modify VI.C.7.a as follows:

> **Title 22 Disinfection Requirements. By ten ~~eight~~ years from the adoption ~~effective~~ date of this Order,** wastewater discharged to the Willow Slough Bypass and Conaway Ranch Toe Drain shall be oxidized, coagulated, filtered, and adequately disinfected pursuant to the DHS reclamation criteria, Title 22 CCR, Division 4, Chapter 3, (Title 22) or equivalent. Until final compliance, the Discharger shall submit progress reports in accordance with the Monitoring and Reporting Program (Attachment E, Section IX.D.1.).

22. Provisions, modify VI.C.7.b.i as follows:

> **By ten ~~eight~~ years from the adoption ~~effective~~ date of this Order,** the Discharger shall comply with final effluent limitations for BOD, TSS, turbidity, total coliform organisms, aluminum, ammonia, and iron. On 25 July 2007, the Discharger submitted a compliance schedule justification for BOD, TSS, turbidity, total coliform organisms, aluminum, ammonia, and iron. As this compliance schedule is greater than one year, the Discharger shall submit annual progress reports in accordance with the Monitoring and Reporting Program (Attachment E, Section IX.D.1.)

23. Monitoring and Reporting Program, Whole Effluent Toxicity Testing Requirements, modify V.A.6 as follows:

> *Ammonia Toxicity* – The acute toxicity testing may be modified to eliminate ammonia-related toxicity until **ten ~~eight~~ years from the adoption ~~effective~~ date of this Order**, at which time the Discharger shall be required to implement the test without modifications to eliminate ammonia toxicity.

24. Fact Sheet, Facility Description, modify II.E as follows:

> Since the existing WWTP treats effluent to an equivalent-to-secondary level, the Discharger anticipates it will take longer than five years (one permit term) to complete the upgrade to tertiary. The Discharger has projected that a new tertiary treatment system could be completed as early as 2015 or as late as

the end of 2018 for construction of new facilities to provide a tertiary (or equivalent) level of treatment and year-round nitrification/denitrification. The Discharger anticipates the new treatment system would be able to comply with priority pollutant water quality standards for all constituents except selenium. Removal of the overland flow system as part of the upgrade to tertiary would improve the effluent quality for most constituents, but would likely cause an increase in effluent selenium. Achieving compliance with the CTR effluent selenium limitations would most likely require a change in the City's water supply.

This Order includes a ten-year~~an eight-year~~ time schedule for the completion of tertiary treatment~~, as described in the Discharger's 25 July 2007 Infeasibility Report as the shortest practicable compliance schedule~~.

This Order contains limitations based on both the existing discharge and the discharge from the proposed tertiary facility.

25. Fact Sheet, Rationale for Effluent Limitations and Discharge Specifications, Aluminum, modify IV.C.3.e as follows:

Interim performance-based maximum daily effluent limitations of 2200 μg/L for Discharge 001 and 12000 for Discharge 002 have been established in this Order. The interim limitations were determined as described in Attachment F, Section IV.E.1, and are in effect through ten ~~eight~~ years from the adoption ~~effective~~ date of this Order of this Order. As part of the compliance schedule, this Order requires the Discharger to submit a corrective action plan and implementation schedule to assure compliance with the final aluminum effluent limitations. In addition, the Discharger shall submit an engineering treatment feasibility study and prepare and implement a pollution prevention plan developed in accordance with CWC section 13263.3(d)(3). The Pollution Prevention Plan required herein is not incorporated by reference into this Order.

26. Fact Sheet, Rationale for Effluent Limitations and Discharge Specifications, Ammonia, modify IV.C.3.f as follows:

Interim performance-based maximum daily effluent limitations of 20.5 μg/L for Discharge 001 and 13.2 for Discharge 002 have been established in this Order. The interim limitations were determined as described in Attachment F, Section IV.E.1., and are in effect through ten ~~eight~~ years from the adoption ~~effective~~ date of this Order. As part of the compliance schedule, this Order requires the Discharger to submit a corrective action plan and implementation schedule to assure compliance with the final ammonia effluent limitations. In

addition, the Discharger shall submit an engineering treatment feasibility study.

27. Fact Sheet, Rationale for Effluent Limitations and Discharge Specifications, Iron, modify IV.C.3.l as follows:

    Interim performance-based maximum daily effluent limitations of 4.0 ug/L for Discharge 001 and 14 ug/L for Discharge 002 have been established in this Order. The interim limitations were determined as described in Attachment F, Section IV.E.1., and is in effect through ten ~~eight~~ years from the adoption ~~effective~~ date of this Order. As part of the compliance schedule, this Order requires the Discharger to submit a corrective action plan and implementation schedule to assure compliance with the final iron effluent limitations. In addition, the Discharger shall submit an engineering treatment feasibility study and prepare and implement a pollution prevention plan developed in accordance with CWC section 13263.3(d)(3). The Pollution Prevention Plan required herein is not incorporated by reference into this Order.

28. Fact Sheet, Rationale for Effluent Limitations and Discharge Specifications, Pathogens, modify IV.C.3.o as follows:

    The establishment of tertiary limitations has not been previously required for this discharge; therefore, a schedule for compliance with the tertiary treatment requirements is included in Special Provisions VI.C.7.a. of this Order. This Order provides interim effluent limitations for BOD, TSS, and total coliform, which the Discharger is currently capable of meeting. Full compliance with the final effluent limitations for BOD, TSS, total coliform, and turbidity are not required by this Order until ten ~~eight~~ years from the adoption ~~effective~~ date of this Order.

29. Fact Sheet, Rationale for Effluent Limitations and Discharge Specifications, Pathogens, modify IV.E.2 as follows:

    BOD, TSS, Total Coliform Organisms, and Turbidity. The establishment of tertiary limitations has not been previously required for this discharge; therefore, a schedule for compliance with the tertiary treatment requirements is included as a Provision in this Order. This Order provides interim effluent limitations for BOD, TSS, and total coliform based on the existing effluent limitations required by Order No. 96-104, which the Discharger is currently capable of meeting. Full compliance with the final effluent limitations for BOD, TSS, total coliform, and turbidity are not required by this Order until ten ~~eight~~ years from the adoption ~~effective~~ date of this Order.

30. Fact Sheet, Rationale for Provisions, Compliance Schedules, modify VII.B.6 as follows:

> The Discharger submitted a request, and justification (dated 22 January 2006), for a compliance schedule for BOD, TSS, turbidity, coliform, aluminum, ammonia, and iron. The compliance schedule justification included all items specified in Paragraph 3, items (a) through (d), of section 2.1 of the SIP. This Order establishes a compliance schedule for the new, final, water quality-based effluent limitations for BOD, TSS, turbidity, coliform, aluminum, ammonia, and iron and requires full compliance for ammonia by ten ~~eight~~ years from the adoption ~~effective~~ date of this Order.

OPTION 2:

This option proposes a five-year time schedule for compliance with aluminum, iron, and ammonia effluent limitations and tertiary treatment related limitations.

Make the following changes to the October 2007 agenda NPDES permit:

31. Effluent Limitations and Discharge Specifications, modify IV.A.1.b as follows:

> **Percent Removal.** Effective five ~~eight~~ years from the adoption ~~effective~~ date of this Order, the average monthly percent removal of BOD 5-day 20°C and total suspended solids shall not be less than 85 percent.

32. Effluent Limitations and Discharge Specifications, modify IV.A.1.g as follows:

> **Turbidity.** Effective five ~~eight~~ years from the adoption date of this Order, effluent turbidity shall not exceed:
>
> i. 2 NTU, as a daily average; and
> ii. 5 NTU, more than 5% of the time within a 24-hour period.

33. Effluent Limitations and Discharge Specifications, modify IV.A.1.h as follows:

> **Total Coliform Organisms.** Effective five ~~eight~~ years from the adoption date of this Order, effluent total coliform organisms shall not exceed:
>
> i. 2.2 most probable number (MPN) per 100 mL, as a 7-day median; and
> ii. 23 MPN/100 mL, more than once in any 30-day period.

34. Effluent Limitations and Discharge Specifications, modify IV.A.1.i as follows:

Tertiary Treatment. Effective five ~~eight~~ years from the adoption ~~effective~~ date of this Order, wastewater shall be oxidized, coagulated, filtered, and adequately disinfected pursuant to the Department of Health Services reclamation criteria, California Code of Regulations, Title 22, Division 4, Chapter 3, (Tile 22) or equivalent.

35. Effluent Limitations and Discharge Specifications, modify IV.A.2.b as follows:

Percent Removal. Effective five ~~eight~~ years from the adoption ~~effective~~ date of this Order~~1 September 2015~~, the average monthly percent removal of BOD 5-day 20°C and total suspended solids shall not be less than 85 percent.

36. Effluent Limitations and Discharge Specifications, modify IV.A.2.g as follows:

Turbidity. Effective five ~~eight~~ years from the adoption date of this Order, effluent turbidity shall not exceed:

i. 2 NTU, as a daily average; and
ii. 5 NTU, more than 5% of the time within a 24-hour period.

37. Effluent Limitations and Discharge Specifications, modify IV.A.2.h as follows:

Total Coliform Organisms. Effective five ~~eight~~ years from the adoption date of this Order, effluent total coliform organisms shall not exceed:

i. 2.2 most probable number (MPN) per 100 mL, as a 7-day median; and
ii. 23 MPN/100 mL, more than once in any 30-day period.

38. Effluent Limitations and Discharge Specifications, modify IV.A.2.i as follows:

Tertiary Treatment. Effective five ~~eight~~ years from the adoption ~~effective~~ date of this Order, wastewater shall be oxidized, coagulated, filtered, and adequately disinfected pursuant to the Department of Health Services reclamation criteria, California Code of Regulations, Title 22, Division 4, Chapter 3, (Tile 22) or equivalent.

39. Effluent Limitations and Discharge Specifications, modify IV.A.3.a as follows:

During the period beginning on the effective date of this Order and ending five ~~eight~~ years from the adoption ~~effective~~ date of this Order, the Discharger shall maintain compliance with the following limitations at D-001, with compliance measured at Monitoring Location EFF-001 as described in the attached MRP, unless otherwise specified. These interim effluent limitations shall apply in

lieu of the corresponding final effluent limitations specified for the same parameters during the time period indicated in this provision.

40. Effluent Limitations and Discharge Specifications, modify Table 7a as follows:

    No limitation for turbidity during the period beginning on the effective date of this Order and ending five ~~eight~~ years from the adoption ~~effective~~ date of this Order.

41. Effluent Limitations and Discharge Specifications, modify IV.A.4.a as follows:

    During the period beginning on the effective date of this Order and ending five ~~eight~~ years from the adoption ~~effective~~ date of this Order, the Discharger shall maintain compliance with the following limitations at D-001, with compliance measured at Monitoring Location EFF-001 as described in the attached MRP, unless otherwise specified. These interim effluent limitations shall apply in lieu of the corresponding final effluent limitations specified for the same parameters during the time period indicated in this provision.

42. Effluent Limitations and Discharge Specifications, modify Table 7d as follows:

    No limitation for turbidity during the period beginning on the effective date of this Order and ending five ~~eight~~ years from the adoption ~~effective~~ date of this Order.

43. Provisions, modify VI.C.7.a as follows:

    Title 22 Disinfection Requirements. By five ~~eight~~ years from the adoption ~~effective~~ date of this Order, wastewater discharged to the Willow Slough Bypass and Conaway Ranch Toe Drain shall be oxidized, coagulated, filtered, and adequately disinfected pursuant to the DHS reclamation criteria, Title 22 CCR, Division 4, Chapter 3, (Title 22) or equivalent. Until final compliance, the Discharger shall submit progress reports in accordance with the Monitoring and Reporting Program (Attachment E, Section IX.D.1.).

44. Provisions, modify VI.C.7.b.i as follows:

    By five ~~eight~~ years from the adoption ~~effective~~ date of this Order, the Discharger shall comply with final effluent limitations for BOD, TSS, turbidity, total coliform organisms, aluminum, ammonia, and iron. On 25 July 2007, the Discharger submitted a compliance schedule justification for BOD, TSS, turbidity, total coliform organisms, aluminum, ammonia, and iron. As this compliance schedule is greater than one year, the Discharger shall submit

annual progress reports in accordance with the Monitoring and Reporting Program (Attachment E, Section IX.D.1.)

45. Monitoring and Reporting Program, Whole Effluent Toxicity Testing Requirements, modify V.A.6 as follows:

Ammonia Toxicity – The acute toxicity testing may be modified to eliminate ammonia-related toxicity until **five ~~eight~~ years from the adoption ~~effective~~ date of this Order**, at which time the Discharger shall be required to implement the test without modifications to eliminate ammonia toxicity.

46. Fact Sheet, Facility Description, modify II.E as follows:

Since the existing WWTP treats effluent to an equivalent-to-secondary level, the Discharger anticipates it will take longer than five years (one permit term) to complete the upgrade to tertiary. The Discharger has projected that a new tertiary treatment system could be completed as early as 2015 or as late as the end of 2018 for construction of new facilities to provide a tertiary (or equivalent) level of treatment and year-round nitrification/denitrification. The Discharger anticipates the new treatment system would be able to comply with priority pollutant water quality standards for all constituents except selenium. Removal of the overland flow system as part of the upgrade to tertiary would improve the effluent quality for most constituents, but would likely cause an increase in effluent selenium. Achieving compliance with the CTR effluent selenium limitations would most likely require a change in the City's water supply.

This Order includes a five-year~~an eight-year~~ time schedule for the completion of tertiary treatment~~, as described in the Discharger's 25 July 2007 Infeasibility Report as the shortest practicable compliance schedule~~.

This Order contains limitations based on both the existing discharge and the discharge from the proposed tertiary facility.

47. Fact Sheet, Rationale for Effluent Limitations and Discharge Specifications, Aluminum, modify IV.C.3.e as follows:

Interim performance-based maximum daily effluent limitations of 2200 µg/L for Discharge 001 and 12000 for Discharge 002 have been established in this Order. The interim limitations were determined as described in Attachment F, Section IV.E.1, and are in effect through five ~~eight~~ years from the adoption ~~effective~~ date of this Order. As part of the compliance schedule, this Order requires the Discharger to submit a corrective action plan and implementation

schedule to assure compliance with the final aluminum effluent limitations. In addition, the Discharger shall submit an engineering treatment feasibility study and prepare and implement a pollution prevention plan developed in accordance with CWC section 13263.3(d)(3). The Pollution Prevention Plan required herein is not incorporated by reference into this Order.

48. Fact Sheet, Rationale for Effluent Limitations and Discharge Specifications, Ammonia, modify IV.C.3.f as follows:

    Interim performance-based maximum daily effluent limitations of 20.5 μg/L for Discharge 001 and 13.2 for Discharge 002 have been established in this Order. The interim limitations were determined as described in Attachment F, Section IV.E.1., and are in effect through five ~~eight~~ years from the adoption ~~effective~~ date of this Order. As part of the compliance schedule, this Order requires the Discharger to submit a corrective action plan and implementation schedule to assure compliance with the final ammonia effluent limitations. In addition, the Discharger shall submit an engineering treatment feasibility study.

49. Fact Sheet, Rationale for Effluent Limitations and Discharge Specifications, Iron, modify IV.C.3.k as follows:

    Interim performance-based maximum daily effluent limitations of 4.0 ug/L for Discharge 001 and 14 ug/L for Discharge 002 have been established in this Order. The interim limitations were determined as described in Attachment F, Section IV.E.1., and is in effect through five ~~eight~~ years from the adoption ~~effective~~ date of this Order. As part of the compliance schedule, this Order requires the Discharger to submit a corrective action plan and implementation schedule to assure compliance with the final iron effluent limitations. In addition, the Discharger shall submit an engineering treatment feasibility study and prepare and implement a pollution prevention plan developed in accordance with CWC section 13263.3(d)(3). The Pollution Prevention Plan required herein is not incorporated by reference into this Order.

50. Fact Sheet, Rationale for Effluent Limitations and Discharge Specifications, Pathogens, modify IV.C.3.n as follows:

    The establishment of tertiary limitations has not been previously required for this discharge; therefore, a schedule for compliance with the tertiary treatment requirements is included in Special Provisions VI.C.7.a. of this Order. This Order provides interim effluent limitations for BOD, TSS, and total coliform, which the Discharger is currently capable of meeting. Full compliance with the final effluent limitations for BOD, TSS, total coliform, and turbidity are not

required by this Order until five ~~eight~~ years from the adoption ~~effective~~ date of this Order.

51. Fact Sheet, Rationale for Effluent Limitations and Discharge Specifications, Pathogens, modify IV.E.2 as follows:

    BOD, TSS, Total Coliform Organisms, and Turbidity. The establishment of tertiary limitations has not been previously required for this discharge; therefore, a schedule for compliance with the tertiary treatment requirements is included as a Provision in this Order. This Order provides interim effluent limitations for BOD, TSS, and total coliform based on the existing effluent limitations required by Order No. 96-104, which the Discharger is currently capable of meeting. Full compliance with the final effluent limitations for BOD, TSS, total coliform, and turbidity are not required by this Order until five ~~eight~~ years from the adoption ~~effective~~ date of this Order.

52. Fact Sheet, Rationale for Provisions, Compliance Schedules, modify VII.B.6 as follows:

    The Discharger submitted a request, and justification (dated 22 January 2006), for a compliance schedule for BOD, TSS, turbidity, coliform, aluminum, ammonia, and iron. The compliance schedule justification included all items specified in Paragraph 3, items (a) through (d), of section 2.1 of the SIP. This Order establishes a compliance schedule for the new, final, water quality-based effluent limitations for BOD, TSS, turbidity, coliform, aluminum, ammonia, and iron and requires full compliance by five ~~eight~~ years from the adoption ~~effective~~ date of this Order.